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TOWN OF GROTON TITLE VI POLICY STATEMENT

The Town of Groton (TOG) is committed to ensuring that no person is excluded from participation, denied benefits, or otherwise subjected to discrimination under any program or activity, on the basis of race, color, national origin, sex, age, or disability.

The Town of Groton as a recipient of federal financial assistance will ensure full compliance with Title VI of the Civil Rights Act of 1964, as amended and related statutes and regulations in all TOG programs and activities.

Any person who believes that he or she has been subjected to discrimination or retaliation based on their race, color, national origin, sex, age, or disability may file a Title VI complaint. Complaints may be filed directly to the Town of Groton or to the Federal Funding agency. Complaints must be filed in writing and signed by the complainant or a representative and should include the complainants name, address, and telephone number or other means by which the complainant can be contacted. Complaints must be filed within 180 days of the date of the alleged discriminatory act.

To request additional information on the Town of Groton's non-discrimination obligations or to file a Title VI complaint, please submit your request or complaint in writing to:

Mary Jo Riley, Title VI Coordinator
102 Newtown Road
Groton, CT 06310
860-441-6636

Complaint forms can be obtained at the Town of Groton website:
www.town.groton.ct.us/depts/parksrec/seniorctr.asp.

Federal Transit Administration (FTA) Title VI complaints may be filed directly to:
Title VI Program Coordinator
East Building, 5th Floor, TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

Federal Highway Administration (FHWA) Title VI complaints may be filed directly to:
Ms. Brenda Armstead, Investigations & Adjudication Team Director
FHWA Office of Civil Rights
1200 New Jersey Avenue, SE, Suite E-81
Washington, DC 20590

Federal Aviation Administration (FAA) Title VI complaints may be filed directly to:
Mr. Ossie Jordan, Civil Rights Officer
New England Region Headquarters, ANE-9
18 New England Executive Park
Burlington, MA 02302

TITLE VI/TITLE VIII COMPLAINT INVESTIGATION PROCESS

WHAT IS AN INVESTIGATION?

An investigation is an official inquiry for the purpose of determining whether there has been a violation of the laws or statutes and includes a determination of appropriate relief where a violation has been found. An investigation requires an objective gathering and analysis of the evidence, which will ensure that the final decision is as accurate as possible.

ROLE OF THE INVESTIGATOR

The investigator is a neutral party provided by the agency to conduct an investigation of the issues raised in a complaint. The investigator's behavior, demeanor, and attitude reflect the agency and may affect the degree of cooperation received from the parties. The investigator has an obligation to identify and obtain relevant evidence from all available sources in order to resolve all of the issues under investigation. *The investigator is not an advocate for the complainant or the respondent.* The investigator is a neutral fact finder.

RESPONSIBILITIES OF THE INVESTIGATOR

The Investigator MUST:

- Never express his/her opinions;
- Never tell the parties that the complaint represents a good case or that the complaint is frivolous;
- Always remain NEUTRAL. DO NOT take sides;
- Write the FACTS. State what the facts are based upon the evidence or testimony;
- Stay in control at all levels of the process;
- Decide who is to be interviewed. If the Complainant or the Respondent is adamant about a witness interview, perform the interview;
- Decide when sufficient evidence has been gathered to begin writing the investigative report;
- Always remain professional and polite;
- Be patient; and
- Be a good listener.

THEORIES OF DISCRIMINATION

A Theory of Discrimination refers to the Type of Discrimination:

- **INTENTIONAL DISCRIMINATION /DISPARATE TREATMENT** – The decision maker was aware of the complainant's race, color, national origin, sex, age, or disability and acted at least in part because of that information. The action was taken because of the complainant's race, color, national origin, sex, age, or disability.
- **DISPARATE/ADVERSE IMPACT** - Discrimination which occurs when a neutral policy or procedure has a disproportionate impact on a protected class. The practice, even though applied equally to all, has the effect of excluding or otherwise adversely affecting a particular group; and

- RETALIATION - Discrimination against persons because of the filing of a complaint, participation in an investigation, or opposing a practice made unlawful pursuant to the laws.

ELEMENTS OF PROOF

HOW DOES THE INVESTIGATOR PROVE DISCRIMINATION:

- ESTABLISH A PRIMA FACIE CASE - The complainant has the responsibility of initially establishing a prima facie case of discrimination. A prima facie case means that the complainant has provided information, which contains all of the elements necessary for a complaint of discrimination. Establishing a prima facie case requires the following elements:
 1. Complainant is a member of a protected group;
 2. Complainant was harmed by some decision; and
 3. Similarly situated persons of a different group were not or would not have been harmed under similar circumstances.

These elements constitute an ideal complaint of discrimination and establish a prima facie case. However, in many situations, the Investigator will not initially have all of these elements. It is the Investigator's responsibility to obtain from the complainant all missing information.

- DURING THE INVESTIGATION - One of the 1st items that must be determined by the Investigator from the Respondent is the reasons for the Respondent's actions against the Complainant. In other words, establish the Respondent's legitimate non-discriminatory reasons for the actions taken against the Complainant. The Investigator must also obtain evidence to determine whether Respondent's reasons are true based upon the evidence or whether the reasons are an excuse (pretext) to discriminate against the Complainant.
- OBTAINING THE EVIDENCE - During the investigation, the Investigator should obtain the following types of evidence:
 1. Respondent's policies and procedures;
 2. Evidence establishing actions taken against the Complainant;
 3. Evidence establishing how others, not in the Complainant's group, were treated in similar situations;
 4. Evidence establishing the normal policies and procedures and how Respondent followed or did not follow the normal policies and procedures when making the decision/action involving the Complainant;
 5. Evidence establishing whether Respondent followed the normal policies and procedures for similarly situated persons; and
 6. A position statement from the Respondent outlining the reasons for the action taken against the Complainant.

EXAMPLES OF ELEMENTS OF PROOF

INTENTIONAL DISCRIMINATION -

- Complainant is a member of a protected group;
- Complainant was excluded from participation in or denied the benefits of a program or activity receiving federal financial assistance;
- Complainant was rejected despite his/her eligibility;
- Respondent selected applicants, whose race, color, national origin, sex, age, or disability were different from the Complainant; or
- The Program remained open and the Respondent continued to accept applications from applicants of a different race, color, national origin, sex, age, or disability than the Complainant.

DISPARATE/ADVERSE IMPACT -

- Respondent has a facially neutral policy or practice that has affected the Complainant;
- The policy or practice operates to disproportionately exclude members of the protected group;
- The policy or practice is a business necessity; or
- There is an effective business alternative with a less adverse impact.

RETALIATION -

- Complainant opposed any policy or practice made unlawful or participated in any manner in an activity pursuant to the laws prohibiting discrimination;
- The individual who allegedly retaliated against Complainant knew or should have known of the opposition or participation;
- An adverse action was taken against the Complainant subsequent to the protected activity;
- There was a *causal connection between the opposition or participation and the decision made involving the Complainant;
- There was a legitimate, non-discriminatory reason for the action taken; or
- The articulated reason is a pretext for retaliatory discrimination.

*Causal connection: To establish a causal connection, establish the following -

- Did the treatment of the Complainant change after the protected activity;
- Time line: How long after the initial protest did the adverse action occur; and
- Compare the Complainant's treatment with others who were not engaged in the protected activity.

COMPLAINT PROCESS

All Title VI complaints will be filed in accordance with the following Title VI Complaint Procedures:

Any person alleging to be aggrieved by a discriminatory practice may in person or through a legal representative, obtain a Title VI Complaint Reporting Form, fill it out and file said complaint with the Title VI Coordinator or the Public Transportation Bureau Head:

- Within 180 days following the date of the alleged discriminatory action; or
- The date when the person(s) became aware of the alleged discriminatory action.

Alternatively, the Title VI Specialist may complete the Complaint Reporting Form and attach the Complainant's letter.

The Department's Title VI Coordinator will be notified of all Title VI complaints. The Title VI Coordinator will review the complaint and inform the appropriate Program Area Designee. Complaints must be in writing, signed by the Complainant or representative, and include the Complainant's name, address, and telephone number, or other means by which the Complainant may be contacted. Complaints shall explain as fully as possible the facts and circumstances surrounding the alleged discriminatory action, and identify the individual(s) and/or organizations responsible for the alleged discriminatory action. In cases where the Complainant will be assisted in converting an oral complaint into a written complaint, the Complainant is required to sign the written complaint. Signed allegations of discrimination received by facsimile or e-mail will be acknowledged and processed. Complaints received by telephone will be reduced to writing and provided to the complainant for confirmation, revision and signature before processing (see attachment A).

The Title VI Coordinator or the Bureau Head receiving the written complaint will review the written complaint to ensure that the required information is provided, the complaint is timely, and is within the appropriate jurisdiction. The complaint will be accepted unless it is withdrawn, is not filed timely, or the Complainant fails to provide the required information after a written follow-up request for the missing information.

Issues that do not involve discrimination or are not based upon a protected basis will not be directed to the appropriate entity. Individuals should never be discouraged from filing a written complaint.

Complaints Filed Against The Department

Written complaints filed with ConnDOT in which ConnDOT is named as the Respondent will be forwarded to the FTA for processing. The allegation(s) will be analyzed by FTA and the Complainant will be notified by FTA of the status of the complaint. The Title VI Specialist may conduct an independent evaluation regarding affected Department policy and may direct actions be taken within the Department to address any policy deficiencies.

Complaints Filed Against A Sub-recipient

Written complaints filed with the ConnDOT in which a ConnDOT sub-recipient (i.e., contractor, subcontractor, consultant, sub-consultant, or other sub-recipient) is named as the Respondent will be analyzed and investigated by the Title VI Coordinator. The Title VI Coordinator may forward a complaint against a sub-recipient to the FTA for investigation. Once the investigation has been conducted and the investigative report (IR) written, the Title VI Coordinator will forward a copy of the complaint and a copy of the IR within sixty (60) days of the complaint date of receipt by the Department to the FTA Civil Rights Coordinator.

A complaint log will be maintained for all complaints filed with and investigated by the Department (see Attachment B). The Investigator will advise the Complainant of his/her rights under Title VI, Title VIII, and related statutes.

The Respondent is notified by the Department that he/she has been named in a complaint. The letter will indicate the Investigator's name and inform the Respondent that he/she will be contacted for an interview. The complaint investigation will be completed within forty (40) days of the date of receipt.

INVESTIGATION PROCESS

Investigative Process includes the following documents/actions:

INVESTIGATIVE PLAN
REQUEST FOR INFORMATION
CONDUCTING INTERVIEWS
ON-SITE VISIT
OBTAINING EVIDENCE
ANALYZING DATA
WRITING THE INVESTIGATIVE REPORT

INVESTIGATIVE PLAN

The Investigative Plan is a working document intended to define the issues and provide a roadmap to complete the investigation. The Investigative Plan is an internal document for use by the Investigator and his/her supervisor to keep the investigation on track and focused on the issues. It is the Investigator's checklist. The following elements should be contained in an Investigative Plan:

- I. Complainant(s) Name and Address/ Attorney For Complainant with Name and Address
- II. Respondent(s) Name and Address/ Attorney For Respondent with Name and Address
- III. Applicable Law (i.e., Title VI, Title VIII, Compliance Review Under Regulations)
- IV. Basis
- V. Issue(s)
- VI. Background
- VII. Name of Person(s) to be Interviewed, including Questions for the Complainant, Respondent, and Witness(es)
- VIII. Evidence to be Obtained During the Investigation

REQUEST FOR INFORMATION

To prepare the Request for Information (RFI), refer to the Evidence section of the Investigative Plan. The RFI is sent to the appropriate official(s) at the Respondent's facility. Contact the Respondent to advise him/her of the complaint and to determine the appropriate official(s) to whom the RFI should be sent and eventually interviewed.

Prepare a cover letter to transmit the RFI. The cover letter should explain the process and provide information regarding any meetings that have been scheduled. Modify the cover letter to satisfy the circumstances. Provide the RFI to the Respondent prior to conducting the on-site visit. This will facilitate the availability of the evidence during the on-site visit.

CONDUCTING INTERVIEWS

When preparing for the interviews, the main objective is to obtain information from witnesses who can provide information that will either support or refute the allegations. A list of major questions will be prepared that address the issues involved in the complaint. During the interview, the following steps will be followed:

- Introduce yourself and outline the interviewing process (i.e., whether a signed statement will be requested, whether notes will be taken, etc.);
- Place the person being interviewed at ease;
- Listen effectively;
- Differentiate factual information from opinions;
- Ask questions best worded to provide factual responses;
- Take clear and precise notes; and
- Obtain a signed statement from the person being interviewed.

COMPLAINANT - The purpose of interviews is to gain a better understanding of the situation outlined in the complaint of discrimination. The Investigator needs to contact the Complainant to ensure that he/she understands the Complainant's allegation(s). It is recommended that the Investigator interview the Complainant prior to preparing the Investigative Plan. If this is not possible, be ready to make any changes as appropriate to the Investigative Plan based upon any new information provided by the Complainant. Always inquire of the Complainant whether he/she desires to resolve the complaint.

RESPONDENT - Respondents are interviewed to provide an opportunity to respond to the allegations raised by the Complainant as well as to provide the Investigator the opportunity to understand the Respondent's operation or policies that Complainant cites in the complaint. As the keeper of the records, you will need to discuss the RFI with the Respondent and be able to explain the need for requesting any document on the list. Inform the Respondent that he/she has the right to submit a formal position statement addressing the Complainant's allegations. Question the Respondent regarding possible settlement opportunities.

WITNESSES - Complainant or Respondent may request that additional persons be interviewed. Determine what relevant information, if any, a witness has to provide prior to conducting an interview. Only interview persons who have information relevant to the allegations raised in the complaint of discrimination. Determine whether the testimony to be provided is relevant. Determine when sufficient interviews have been conducted.

ON-SITE VISIT

An On-Site visit will be conducted when:

- Personal contact with the Complainant and the Respondent may yield information and clarification that might not otherwise be discovered by only reviewing the written documents or telephone contacts;
- It is necessary to review the physical environment;
- More effective communication can be established with representatives and witnesses of the Complainant and Respondent; and
- Documentation can only be examined on-site for reasons for convenience, cost, format, or volume.

OBTAINING EVIDENCE

Evidence requested shall be related to the issues cited in the complaint. An evidence request may contain some or all of the following:

- The policies and procedures regarding the practice that Complainant has alleged;
- All documents relating to Respondent's dealing with Complainant in the situation described in the complaint;
- Documents which exhibit how others, not in the Complainant's group, were treated under similar circumstances;
- Respondent's reason(s) for the action taken; and
- A formal position statement from Respondent addressing Complainant's allegations.

The Types of Evidence include the following:

- CIRCUMSTANTIAL EVIDENCE - Includes facts from which may be inferred intent or discriminatory motive and proves intent by using objectively observable data;
- COMPARATIVE EVIDENCE - A comparison between similarly situated individuals;
- DIRECT EVIDENCE - Related to the Respondent's motive, it is defined as any statement or action by an official of the Respondent that indicates a bias against members of a particular group;
- DOCUMENTARY EVIDENCE - Written material, which is generated during the course of normal business activity;
- STATISTICAL EVIDENCE - Statistics, facts, or data of a numerical type, which are assembled, classified, and tabulated so as to present significant information about a given subject; and
- TESTIMONIAL EVIDENCE - Evidence which is provided orally.

ANALYZING DATA

Data will be analyzed to determine whether a violation has occurred. When analyzing data, you must:

- Review what happened to the Complainant;
- Compare Complainant's treatment with the appropriate policies and procedures;
- Compare Complainant's treatment with others in the same situation;
- Review Respondent's reason(s) for the treatment afforded the Complainant; and
- Compare Respondent's treatment of the Complainant with the treatment afforded others.

WRITING THE INVESTIGATIVE REPORT

The Investigative Report (IR) will contain the following sections:

- Complainant(s) Name and Address
- Respondent(s) Name and Address
- Applicable Law
- Basis
- Issues
- Findings For Each Issue with a corresponding Conclusion for Each Issue
- Recommended Decision
- Recommendations (If Applicable)

LIMITED-ENGLISH-PROFICIENCY IMPLEMENTATION PLAN GUIDANCE FOR SUBRECIPIENTS

Introduction

On August 11, 2000, President Clinton issued Executive Order 13166, entitled "*Improving Access to Services for Persons With Limited English Proficiency*" (LEP). The Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), and the Federal Aviation Administration (FAA) were instructed to ensure that all FHWA/FTA/ FAA funding recipients provide meaningful access to their LEP applicants and beneficiaries.

Language for LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities. Recipients of Federal financial assistance have an obligation to reduce language barriers that can preclude meaningful access by LEP persons to important governmental services.

While most individuals living in the United States read, write, speak and understand English, there are many individuals for whom English is not their primary language. Individuals, who have a limited ability to read, write, speak, or understand English are Limited English Proficient, or LEP. The greater the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population, the more likely language services are needed.

As a subrecipient of Federal funding subrecipients must take reasonable steps to ensure meaningful access to all federal-aid programs and activities to LEP persons. To comply with Title VI of the Civil Rights Act of 1964, as amended, subrecipients must adhere to acceptable compliance standards ensuring reasonable access to all federal-aid Programs and activities by LEP persons and thereby preventing discrimination on the basis of national origin. Coverage extends to all subrecipient programs and activities.

This section of the Title VI Plan describes the minimum steps that must be taken to ensure meaningful access by LEP persons to federal-aid Programs and activities.

Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be LEP; and therefore, are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter.

Examples of populations likely to include LEP persons who may be served or encountered and should be considered when planning language services include, but are not limited to:

- Public transportation passengers
- Airport passengers
- Persons who apply for permits or security badges
- Persons subject to the control of State or local transportation enforcement authorities, including,

for example, commercial motor vehicle drivers.

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- Persons served by emergency transportation response programs
- Persons living in areas affected or potentially affected by transportation projects
- Business owners who apply to participate in the Disadvantaged Business Enterprise Program.

Four-Factor Analysis

The LEP Program is designed to be flexible and fact dependent. The four-factor analysis should be utilized to assess what actions are to be taken. The factors are as follows:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee. (The greater the number or proportion of LEP persons, the more likely language services are needed.)
2. The frequency with which LEP individuals come in contact with the program, activities or services. (The more frequent the contact with a particular language group, the more likely that enhanced language services in that language are needed.)
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP population. (Make a determination as to whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual.)
4. The resources available to the recipient and the overall costs to provide LEP assistance. (Examine cost and benefit; limiting services must be well-substantiated before using this factor as a reason to limit language assistance.)

In areas where a significant number of LEP individuals are served, any resource limitations must be well substantiated.

Resources that may reduce the costs needed to provide access to LEP individuals include, but are not limited to:

- Training bilingual staff to act as interpreters and translators.
- Information sharing through industry groups.
- Telephonic and video conferencing interpretation services.
- Translating vital documents posted on Web sites.
- Pooling resources and standardizing documents to reduce translation needs.
- Using qualified translators and interpreters to ensure that documents need not be "fixed" later and that inaccurate interpretation does not cause delay or other costs.
- Centralizing interpreter and translator services to achieve economies of scale.
- Formalized use of qualified community volunteers.

Language Services

There are two main ways to provide language services; oral interpretation either in person or via telephone interpretation services; and written translation. Oral interpretation can range from on-site interpreters for critical services to commercially available telephonic interpretation services. Written translation can range from translation of an entire document to translation of a short description of the document.

Providing transportation access to LEP persons is crucial. An LEP person's inability to effectively utilize public transportation may adversely affect his or her ability to obtain health care, or education, or access to employment. When it is determined that interpretation is needed and reasonable, it should be provided in a timely manner in order to be effective.

Procedure

If a LEP person voluntarily chooses to provide his or her own interpreter, the subrecipient should consider whether a record of that choice and the recipient's offer of assistance are appropriate. Where precise, complete and accurate interpretations or translations of information and/or testimony are critical, or where the competency of the LEP person's interpreter is not established, the subrecipient may decide to provide its own, independent interpreter, even if the LEP person wants to use his or her own interpreter as well. Extra caution should be used when the LEP person chooses to use a minor as an interpreter.

Interpreters should demonstrate proficiency in and ability to communicate information accurately in both English and in the other language and identify and employ the appropriate mode of interpreting (e.g., consecutive, simultaneous, summarization, or sight translation). Interpreters should have knowledge in both languages of any specialized terms or concepts peculiar to the program or activity and of any particularized vocabulary and phraseology used by the LEP person; and understand and follow confidentiality and impartiality rules to the same extent as the person for whom they are interpreting and/or to the extent their position requires. They should understand and adhere to their role as interpreters without deviating into a role as counselor, legal advisor, or other roles.

The subrecipient shall determine which items will be translated; applying the four-factor analysis. The types of items may include but not be limited to:

- Emergency transportation information.
- Markings, signs, and packaging for hazardous materials and substances.
- Signs in bus and train stations, and in airports.
- Notices of public hearings (i.e. legal notices) regarding ConnDOT's proposed transportation plans, projects, or changes, and reduction, denial, or termination of services or benefits.
- Service schedules
- Signs in waiting rooms, reception areas, and other initial points of entry.
- Notices advising LEP persons of free language assistance and language

- identification cards for staff (i.e. "I speak cards).
- Statements about services available and the right to free language assistance services in appropriate non-English languages, in brochures, booklets, outreach and recruitment information, and other materials routinely disseminated to the public.
 - Written tests that do not assess English-language competency, but test competency for a particular license, job, or skill for which knowing English is not required.
 - Applications or instructions on how to participate in a recipient's program or activity or to receive recipient benefits or services.
 - Consent forms.

Responsibilities

Subrecipients are responsible for ensuring that LEP persons have meaningful access to all federal-aid Programs and activities. Whenever a subrecipients holds a public hearing/meeting the legal notice regarding the hearing/meeting must indicate that LEP persons may request language assistance (translation services or an interpreter) by contacting a representative to communicate this need within a reasonable amount of time prior to the event. Commuter services (bus, rail, ferry service, airport, etc.) must offer informational documents in alternate languages and provide reasonable accommodation regarding translation services at train stations, airports, etc.

LIMITED ENGLISH PROFICIENCY/ENVIRONMENTAL JUSTICE (MAPS)

These maps will enhance the Department's efforts towards providing meaningful access to affected individuals in all federal-aid programs and activities. These maps are to be used on a department-wide basis and will assist the user in identifying populations within a project area or transit area that may require additional assistance or services. These maps may also help the user to determine how outreach efforts may need to be tailored to reach affected populations to promote full and inclusive participation and to ensure that their service needs are being met.

Utilizing Global Information Systems (GIS) technology along with data available from the 2000 Census, we are able to direct our attention to Environmental Justice and Limited English Proficiency affected populations.

The information was gathered by utilizing the 2000 Census datasets population by census tract for Connecticut. These datasets are available at the County level from the Census Bureau. For all of the basic themes of Difficulty Speaking English, Low Income and the Racial and Ethnic Populations, the same geographic base was used. Data was downloaded by County. The Connecticut Counties are as follows: Fairfield County, Hartford County, New Haven County, New London County, Litchfield County, Tolland County, Middlesex County, and Windham County. The Counties formed a statewide datasheet by census tract for the whole state of Connecticut population

Using Global Information Systems (GIS) technology with data available from the 2000 Census tract and county level information for the state of Connecticut, population statistics for the following population subsets were developed: Racial and Ethnic, Low Income and Limited English Proficiency.

Limited English Proficiency (LEP)

Limited English Proficiency (LEP) refers to persons whose primary language is other than English and/or who have limited fluency in the English language. The Census Bureau defines such groups as being in "Linguistic Isolation".

Due to U.S. Census Bureau confidentiality rules, a procedure was developed to focus on this portion of the Connecticut population. The "Limited English Proficiency" populations were layered over the "Language Spoken at Home" populations to achieve the desired focus group.

The datasets for "Language spoken at home for 18 year olds and over", the "Ability to Speak English Less than Well and not at all", and "Language by Linguistic Isolation" were obtained from the 2000 Census. Based upon these datasets, various subtotals of Limited English Proficiency were calculated as a percentage of total population in each census tract: tract population, town population, percentage of town non-English speaking, language spoken at home and total non-English population.

Census tracts having populations over 5% in the categories "Language in the Home" and "Limited Proficiency" were employed in developing maps for the following language groups: Spanish, Portuguese, French Creole- French Cajun, Italian, Russian, Polish, Greek and Indo European group (Albanian, Gaelic, Lithuanian and Romanian)

Low Income and Poverty

Utilizing the above procedure, the "Low Income Individual" population was layered onto the base (GIS) map. According to the 2000 Census, income thresholds for individuals qualifying as either living in poverty or having low income are adjusted annually by the Federal Department of Health and Human Services. This Annual Poverty level was used as a base for determining the portion of Connecticut population living in poverty.

It was determined that individuals would be identified as at the poverty level if the household earnings did not exceed 150% of the National Poverty Threshold Level and individuals with income levels not exceeding 200% of the National Poverty Threshold Level would be classified as low income.

To develop poverty level concentration areas, a percentage of households at or below the poverty level were determined based upon the income of the total households in each census tract.

Minority and Ethnic Populations

The information used to develop these maps was obtained from the 2000 Census, "Races and Hispanic" cultural population by census tract. The Census Bureau separates the race and ethnic populations into two separate datasets. One dataset is for the Hispanic (ethnic) population and the other for all Races (which included Hispanic individuals identifying with one of the identified Races). As a result of this subgroup classification, some double counting of the Hispanic population can occur.

The classifications by race are: Black or African American; Asian; Native Hawaiian and other Pacific Islander; and the American Indian and Alaska native. A Hispanic designation is included in all of the race classifications as well as in combination with more than one race category.

Sources:

1. Based on the Capital Region Council of Governments Discussion Paper "Reducing Language Barriers"
2. 2008 HHS Poverty Guidelines from the U.S. Department of Health and Human Services
3. U.S. Census Bureau, "Preliminary Estimates of Weighted Average Poverty Thresholds" for 2007
4. Census 2000 Brief on "Overview of Race and Hispanic Origins"

Town of Groton

TITLE VI DISCRIMINATION COMPLAINT FORM

Complainants Name:

Street Address:

City/State/Zip:

Phone: _____

Discrimination because of: ☐ Race/ ☐ Color/ ☐ National

Origin/ ☐ Sex/ ☐ Age/ ☐ Disability/ ☐ Creed (FAA only)/ ☐ Other

Please provide the date(s) and location of the alleged discrimination, the name(s) of the individual(s) who allegedly discriminated against you including their titles (if known).

Please provide the names, addresses and telephone numbers of any witnesses.

Explain as briefly and as clearly as possible what happened, how you feel that you were discriminated against and who was involved. Please include how other persons were treated differently from you.

Signature: _____ **Date:** _____

You may use additional sheets of paper if necessary. Also include any written materials pertaining to your complaint.

YOUR RIGHTS AS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

Title VI of the Civil Rights Act of 1964, as amended, ensures that no person in the United States shall, on the grounds of race, color, national origin, sex, age or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance.

PROTECTIONS INCLUDE BUT ARE NOT LIMITED TO: PUBLIC WAITING AREAS, PASSENGER HOLDING AREAS, SERVICE, QUALITY OF SERVICE, ROUTING, SCHEDULING, SNACK BARS, GIFT SHOPS, TICKET COUNTERS, BAGGAGE HANDLERS, CAR RENTAL AGENCIES, TAXIS, RESTAURANT FACILITIES, RESTROOMS, PASSENGER GROUND TRANSPORTATION.

Any person who believes that he or she, has been subjected to discrimination prohibited under Title VI of the Civil Rights Act of 1964, as amended, may file a complaint. For more information on Title VI, please contact the Town of Groton Title VI coordinator.

Complaints can be filed with either of the following in person or by mail:

Mary Jo Riley, Title VI Coordinator
102 Newtown Road
Groton, CT 06340
860-441-6636

FTA Title VI Program Coordinator
East Building, 5th Floor TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

Complaint forms also available on The Town of Groton website:

www.town.groton.ct.us/dept/parksrec/seniorctr.asp